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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH MITSUYOSHI KANESHIRO (1),
DENNIS KUNIYUKI MITSUNAGA (2),
TERRI ANN OTANI (3),
AARON SHUNICHI FUJII (4),
CHAD MICHAEL MCDONALD (5),
SHERI JEAN TANAKA (6),

Defendants.

CR No. 22-00048-TMB-NC

UNITED STATES' MOTION TO
FILE UNREDACTED BRIEF
REGARDING MAI'S
ASSERTION OF ATTORNEY-
CLIENT PRIVILEGE AND
EXHIBITS 1-3 UNDER SEAL

The United States' Brief Regarding MAI's Assertion of Attorney-Client Privilege and Exhibits 1-3 attached to the United States' brief includes material from the grand jury investigation in the above-captioned case. Accordingly, given the brief and attachments describe matters occurring before the grand jury, in an abundance of caution, the United States moves to file its unredacted brief and

Exhibits 1-3 under seal pursuant to Fed. R. Crim. P. 6(e). The United States has filed a redacted version of its brief in the public docket at ECF No. 643.

Dated: April 8, 2024

Respectfully submitted,

MERRICK B. GARLAND
Attorney General

/s/ Colin M. McDonald
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JANAKI G. CHOPRA
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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that:

I, Colin M. McDonald, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, CA 92101-8893. I am not a party to the above-entitled action. I have caused service of the foregoing on all parties in this case by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2024

/s/ Colin M. McDonald

COLIN M. MCDONALD